

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**GLOBAL EQUITY MANAGEMENT)
(SA) PTY. LTD.,)
Plaintiff,)
)
v.) **Civil Action No. 3:17-cv-00081-MHL**
)
**AMAZON WEB SERVICES, INC., and)
VADATA, INC.)
Defendants) **JURY TRIAL DEMANDED******

SPECIAL APPEARANCE AND OPPOSED MOTION TO WITHDRAW AS COUNSEL

Plaintiff Global Equity Management (SA) Pty. Ltd. (“GEMSA”) respectfully requests that William P. Ramey, III and the law firm of Ramey & Schwaller, LLP be permitted to withdraw as counsel of record for GEMSA in the above-captioned matters and that ECF notifications to them be terminated in connection with this case.

This Motion is filed subject to Defendant’s Rule 12(b)(5) Motion to Quash for Insufficient Service of Process¹ and Defendant’s Rule 12(b)(2) Motion to Dismiss for Lack of Personal Jurisdiction.² Defendant’s filing of this Motion is not intended to be construed as an entry of a general appearance in this matter or in 3:16-cv-00619 but only to withdraw as counsel of record.

1. I, William P. Ramey, III, after assisting GEMSA through the litigation activities, notified Schumann Rafizadeh (“Rafizadeh”) on June 2, 2017, that I would be filing a motion to withdraw as counsel on or about June 15, 2017.

¹ Doc. Nos. 18 and 19 from 3:16-cv-00619.

² Doc. Nos. 25 and 26 from 3:16-cv-00619.

2. I, William P. Ramey, III, forwarded copies of the motions to withdraw to Mr. Rafizadeh of GEMSA on June 13, 2017.
3. Rafizadeh did not respond to the communication. However, on June 14, 2017, Rafizadeh's new counsel Ed Rothberg of Hoovers Slovacek sent a letter terminating the engagement effective 30 days from June 14, 2017, i.e. July 14, 2017.
4. William P. Ramey, III of Ramey & Schwaller, LLP moves the Court for permission to withdraw as counsel of record for GEMSA as GEMSA has not fulfilled their obligations under the engagement agreement with Ramey & Schwaller, LLP and due to a breakdown in communication and understanding between Ramey & Schwaller, LLP and GEMSA as to the purpose and meaning of legal representation. For these reasons, it is impossible for Ramey & Schwaller, LLP to effectively represent GEMSA in this matter.
5. William P. Ramey, III of Ramey & Schwaller, LLP has taken reasonable steps to avoid any foreseeable prejudice to the rights of GEMSA. A copy of this motion has been provided to GEMSA and GEMSA is aware that it needs to retain private counsel as GEMSA cannot represent itself.
6. William P. Ramey, III has notified GEMSA of the case status and will send Rafizadeh a 30-day docket if the Court grants this motion.
7. William P. Ramey, III of Ramey & Schwaller, LLP stands ready to deliver to GEMSA all papers and property to which the client is entitled.
8. The last known address for GEMSA is 458 Morphett Road, Warradale, South Australia 5046. The address for GEMSA's new counsel is Hoover Slovacek,

5051 Westheimer, Suite 1200, Houston, Texas 77056.

The withdrawal of Mr. Ramey will not have a detrimental effect on GEMSA or its representation in this case, nor will it cause any delay in this proceeding or prejudice any party as the cases are presently stayed and there are no current docket dates. Accordingly, there is adequate time for GEMSA to obtain counsel in Virginia. Further, GEMSA has new counsel at least in Texas.

The undersigned has attempted to confer with counsel for Defendants, and Defendants oppose this request or have not responded.

GLOBAL EQUITY MANAGEMENT
(SA) PTY. LTD.

By /s/ William P. Ramey, III
Counsel

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*Counsel for Global Equity Management
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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing

to the following:

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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2017, this instrument was served to all counsel of record who are deemed to have consented to service via email.

/s/ William P. Ramey, III
William P. Ramey, III